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March 17, 2022

Via ECF

The Honorable Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Upsolve, et al. v. James*, No. 22-cv-0627 (PAC)

Dear Judge Crotty:

This firm represents Mobilization for Justice, Legal Services New York City (which includes Bronx, Brooklyn, Manhattan, Queens and Staten Island Legal Services), the Feerick Center for Social Justice at Fordham Law School, the Queens Volunteer Lawyers Project and the Brooklyn Bar Association Volunteer Lawyers Project. We write on their behalf, as well as anticipated additional legal services, consumer advocacy, and social justice organizations and leaders (together “Advocate Amici”) who intend to file brief as *amici curiae* in the above-referenced case. We write to request a short extension of time for Advocate Amici to file their brief (from March 28 to April 13, 2022). Defendant’s counsel consents to this request and has indicated that granting this extension request will not impact Defendant’s ability to comply with the current briefing schedule. Plaintiffs’ counsel does not oppose our request for an extension (or the filing of a brief by Advocate Amici) so long as the merits briefing schedule remains unchanged as Defendant’s counsel has indicated.

Plaintiffs in this case seek a preliminary injunction to allow them to implement a program for nonlawyers to provide legal advice to consumers being sued in debt collection cases without running afoul of New York’s unauthorized practice of law rules. Five *amicus curiae* briefs have been filed in support of Plaintiffs’ motion. Advocate Amici intend to file a brief opposing Plaintiffs’ motion. Advocate Amici include individuals and organizations that have decades of experience helping and defending low-income New Yorkers in debt collection cases; are intimately knowledgeable about debt collection lawsuits in New York, and specifically New

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York City Civil Court; and have advocated for various debt collection reforms in New York to increase access to justice for low-income New Yorkers and New Yorkers of color. The *amici curiae* brief by Advocate Amici will provide the Court helpful context and perspective concerning the subject matter at the heart of this action and will correct certain factual errors contained in the filings.

Given the voluminous filings in the case, Advocate Amici respectfully request that they be allowed until April 13, 2022, to file their brief. Thank you for your consideration.

Respectfully submitted,

/s/ Matthew D. Brinckerhoff

c. All counsel of record (via ECF)